

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

JAMAAL CAMERON; RICHARD
BRIGGS; RAJ LEE; MICHAEL
CAMERON; MATTHEW
SAUNDERS, individually and on
behalf of all others similarly situated,

Plaintiffs,

v.

MICHAEL BOUCHARD, in his
official capacity as Sheriff of Oakland
County; CURTIS D. CHILDS, in his
official capacity as Commander of
Corrective Services; OAKLAND
COUNTY, MICHIGAN,

Defendants.

Case No. 20-cv-10949-LVP-MJH
Hon. Linda V. Parker

DECLARATION OF KARLA LEWIS

I, Karla Lewis, declare:

I make this declaration based upon my own personal knowledge, and if called to testify, I could and would do so competently.

- 1) I am currently incarcerated at the Oakland County Jail (“the Jail”). I have been in Jail since February 11, 2020. I am scheduled to be released on September 15, 2020.
- 2) I have been housed in the supermax section for three weeks and share a cell with a bunkmate. I am in supermax cell E17.
- 3) Supermax is considered a disciplinary section within the Jail, however, I have never been disciplined. I am locked down for twenty-three hours per day. There is another person in this section of the Jail who is mentally ill, and she smears feces on

the wall and urinates on herself. The guards yell at her to stop, but they do not clean up when she does that. There is still feces on the wall in her cell. She floods her cell, so the guards turn off her water. I can hear her screaming for water all the time.

4) I am fifty-five years old, and suffer from high blood pressure, lupus, and fibromyalgia. I also suffer from PTSD and depression. I was prescribed hydrochlorothiazide, oxycodone, Cymbalta, and Wellbutrin. Of my prescribed medications, the Jail will only give me the Cymbalta. When my blood pressure spiked a few days ago, the nurse told me it wasn't "that bad" and dismissed me.

5) I received my first face mask on Wednesday, April 22, 2020.

6) On April 28, 2020, I received soap for the first time in four days, despite repeated requests for it. I ran out the next day, and have not received any more since then. On Wednesday, April 29, 2020, I received deodorant for the first time since the commissary closed six weeks ago. Once a week, I receive enough toothpaste to brush my teeth one time.

7) Guards have told me that no one in the Jail has coronavirus, but I was tested for the first time on May 1, 2020, so I do not know how they would know that.

8) Half of the guards do not wear facemasks. They are not practicing social distancing and deliver our food from an arm's length away.

9) The food I am being given is inadequate. It consists of a peanut butter and jelly sandwich and an apple twice a day and a small cold slice of pizza and slimy celery sticks once per day. I go to bed hungry every night because the Jail gives us breakfast at 5 am, lunch at 10 am, and dinner at 3 pm. After dinner, we are not given any food until breakfast the next day. Since the commissary is closed, there is no way to get food at all while we are waiting for breakfast. On April 30, 2020, I was served a peanut butter and jelly sandwich that had maggots in it.

10) We receive powdered milk in a long white tube instead of cartons of milk. We have to use the water in our cell to prepare the milk.

11) Common areas are not being mopped. The shower is filthy. It is full of hair and soap shards. It is cleaned by trustees once every three days, if that.

12) I am very worried about contracting the Coronavirus. We all share showers, toilets, and sinks in the cellblock. Common surfaces in the cellblock are touched by every inmate.

13) Every day I become more and more traumatized about the conditions here.

Under 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

May 3, 2020

/s/ Karla Lewis
Karla Lewis

*consent for signing given telephonically

Due to the COVID-19 crisis, it was not possible to obtain a written signature on the above declaration. I am an attorney admitted to the Eastern District of Michigan. On May 3, 2020, I personally spoke with Karla Lewis and read this declaration to her. Karla Lewis told me that the information in the above declaration is true, and gave me verbal consent to sign on her behalf.

I declare under penalty of perjury, under 28 U.S.C. § 1746, that the foregoing is true and correct.

/s/ Syeda Davidson
Syeda Davidson